

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

BOARHEAD FARM AGREEMENT GROUP,

Plaintiff,

V.

ADVANCED ENVIRONMENTAL
TECHNOLOGY CORPORATION, et al.,

Defendants.

CIVIL ACTION NO.
02-cv-3830 (LDD)

**HANDY & HARMAN TUBE COMPANY, INC.'S MOTION TO JOIN IN
DEFENDANTS TECHALLOY CO., INC. AND RAHNS SPECIALTY
METALS, INC.'S MOTION TO COMPEL RESPONSES TO
INTERROGATORIES AND FOR EXTENSION OF FACT DISCOVERY
PERIOD**

Defendant, Handy & Harman Tube Company, Inc. (Handy & Harman Tube Company”),
by and through its undersigned counsel, Carella, Byrne, Bain, Gilfillan, Cecchi, Stewart &
Olstein, hereby joins in defendants Techalloy Co., Inc. and Rahns Specialty Metals, Inc.’s
Motion to Compel Responses to Interrogatories and for Extension of Fact Discovery Period.
Defendant Handy & Harman Tube Company hereby incorporates by reference defendants
Techalloy Co., Inc. and Rahns Specialty Metals, Inc.’s Motion to Compel Responses to
Interrogatories and for Extension of Fact Discovery Period and Memorandum of Law as if set
forth herein at length.

WHEREFORE, defendant Handy & Harman Tube Company respectfully requests that this Court grant defendants Techalloy Co., Inc. and Rahns Specialty Metals, Inc.'s Motion to Compel Responses to Interrogatories and for Extension of Fact Discovery Period.

Respectfully submitted,

CARELLA, BYRNE, BAIN, GILFILLAN,
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By: MF1386
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Attorneys for Defendant,
Handy & Harman Tube Company, Inc.

Dated: March 21, 2005

CERTIFICATE OF SERVICE

The undersigned hereby certifies that on this date caused true and correct copies of the attached Motion to Join in Defendants Techalloy Co., Inc. and Rahns Specialty Metals, Inc.'s Motion to Compel Responses to Interrogatories and for Extension of Fact Discovery Period to be served on all counsel of record via first class mail, postage prepaid, addressed as follows:

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